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20 **UNITED STATES DISTRICT COURT**
21 **CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION**

22 CHARMAINE CHUA, et al.,

23
24 PLAINTIFFS,

25 vs.

26 CITY OF LOS ANGELES, et al.,

27 DEFENDANTS.

Case No.: 16-cv-00237-JAK-GJS

JOINT REPORT RE
SETTLEMENT AND
REQUEST TO VACATE AND
RESET SCHEDULING DATES

TRIAL DATE

DATE: NONE

TIME: NONE.

CTRM: 10B, 1ST STREET

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1 The parties engaged in extensive settlement discussions with
2 former Magistrate Judge Gandhi but were unable to reach agreement on
3 a resolution of the case. Accordingly, the parties now are prepared to
4 move forward with a trial in this matter.

5 Since the conclusion of the settlement process, the parties have
6 engaged in multiple discussions regarding the issues to be addressed
7 going forward. As a preliminary matter, the parties have agreed to a
8 protective order for the production of arrest and booking records by the
9 City for the 6th and Hope class members. The records were previously
10 requested in discovery by Plaintiffs and were the subject of a meet and
11 confer process with the prior Deputy City Attorney assigned to this case.
12 Plaintiffs held off compelling disclosure while settlement discussions
13 were taking place.

14 The records are necessary for review by Plaintiffs' expert to prepare
15 his report. Because the City requires some time to compile the records,
16 the parties request that the Court reset the date for exchange of expert
17 reports to October 15, 2018. There is currently no trial date in this case,
18 so there is no prejudice to the Court in permitting this extension.

19 The parties also conferred on matters relating to the conduct of a
20 trial in this instance, including, among other issues, the possible
21 bifurcation of liability and damages. The parties believe that the
22 discussions are productive. Accordingly, the parties request that the
23 Court permit time to complete the discussions and submit a report to the
24 Court with the results of their discussions, including points of agreement
25 and disagreement, in advance of a renewed scheduling conference with
26 the Court.

27 The parties believe that they can complete their discussions and
28 submit a further Joint Status Report to the Court no later than

1 September 24, 2018. Accordingly, the parties request that the Court
2 issue an order, directing the parties to file a Joint Status Report with the
3 Court no later than September 24, 2018 and that the Court set a
4 scheduling conference thereafter.

5
6
7 Dated: September 6, 2018

Respectfully submitted,

8
9 Kaye, McLane, Bednarski & Litt, LLP
10 Law Office of Carol A. Sobel
11 Schonbrun, Seplow, Harris & Hoffman
12 Law Office of Colleen Flynn
13 Law Office of Matthew Strugar

14 /s/ Carol A. Sobel

15 By: CAROL A. SOBEL
Attorneys for Plaintiffs

16 Dated: September 6, 2018

17 Michael N. Feuer, City Attorney
18 Thomas Peters, Chief Asst City Attorney
19 Cory M. Brente, Asst. Supv. City Attorney
20 Geoffrey Plowden, Dep. City Attorney

21 /s/ Geoffrey Plowden

22 By: GEOFFREY PLOWDEN
23 Attorneys for Defendants
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